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September 1, 2005

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## BY HAND DELIVERY

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 455 12<sup>th</sup> Street, SW Washington, DC 20554

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SEP - 1 2005

Attention:

Acting Chief

Wireless Telecommunications Bureau

Federal Communications Commission Office of Secretary

Re:

Interim Report on Wireless E-911 Implementation

Corr Wireless Communications, LLC

## Dear Madame:

Corr Wireless Communications, LLC ("Corr") submits this Interim Report as required by the Commission's May 22, 2005 Order in CC Docket 94-102. Corr is a Tier III carrier which had asked for interim relief in August of 2003 but actually then became E-911 compliant as of January 15, 2004. As reported in its August 2003 request for interim relief, Corr installed a network-based solution using the Andrew technology. In the intervening year and a half, Corr was not satisfied with the reliability of the installed system (and the manufacturer's support for the product) and decided to shift to a simpler, proven technology used by a neighboring carrier. That system is the Nortel Integrated GMLC/SMLC. The system was installed in the early summer of this year and was tested and optimized in July and August. It is fully functional at this time. There has been no interruption of the service previously available using the Andrew system, and that system will continue to be used on the legacy TDMA sites.

Corr has received requests for Phase I service from eight PSAPs in parts of Alabama which it serves. Phase I service is being provided to all of these PSAPs. Corr has also received Phase I requests from PSAPs in six cities or counties where it is not licensed to provide service. Obviously, those requests cannot be accommodated. In addition, Corr has received requests for Phase II service from seven PSAPs where it is licensed to provide service and six PSAPs where it is not licensed. Again, no service can be provided where Corr is not licensed to provide service at all. Of the seven counties

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where Corr does provide service, Phase II is being provided in all. In one of these counties, Calhoun, the PSAP requested Phase II service on August 16, 2004. However, because Corr has only four very widely separated cell sites in that county, it has been scientifically impossible to get sufficient triangulation to establish a call location with the required Phase II accuracy. Nevertheless, the Nortel system has been installed and is delivering call location data with reasonable accuracy superior to Phase I levels. More cell sites are planned for Calhoun County in calendar years 2006 and 2007, and Corr anticipates that the addition of these cell sites will make more accurate Phase II service possible there. Corr has advised the Calhoun PSAP of the site-limited constraint on Phase II accuracy and of its plans to add more cell sites. In cooperation with the Calhoun County authorities, Corr is planning to conduct further accuracy testing in the area in early-to-mid September, and will continue to coordinate with them as additional sites come on line. Because Corr does not actively market its service in Calhoun County, overall call volume there is very low, and therefore very few emergency calls are likely to occur until the overall cellular service there is itself expanded and improved.

Please contact the undersigned should you require further particulars.

Respectfully submitted,

Corr Wireless Communications, LLC

Donald J. Ev

Its Attorney

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<sup>&</sup>lt;sup>1</sup> Initiation of this service was delayed in Blount and Marshall Counties pending installation of the improved system which went into operation in August. However, both counties had been apprised of the new installation and have been very involved in assisting in the set-up and testing of the new system.